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12 Attorneys for Defendant  
13 nextSource, Inc.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO COURTHOUSE

DEMETRIC DI-AZ, OWEN DIAZ and  
LAMAR PATTERSON,

Case No. 3:17-cv-06748-WHO  
*[Removed from Alameda Superior Court,  
Case No. RG17878854]*

Plaintiffs,

vs.

TESLA, INC. DBA TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; NEXTSOURCE, INC.,

**[PROPOSED] ORDER GRANTING  
DEFENDANT NEXTSOURCE, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL IN  
SUPPORT OF SUMMARY JUDGMENT  
OR, IN THE ALTERNATIVE, MOTION  
FOR SUMMARY ADJUDICATION OF  
ISSUES**

Defendants.

Amended Complaint Filed: December 26, 2018

## **[PROPOSED] ORDER**

Pursuant to Local Rules 7-11 and 79-5, as well this Court's Standing Order regarding administrative motions to seal, Defendant nextSource, Inc. filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibits B through E and Exhibits G and I to the Declaration of Juan C. Araneda in Support of Defendant nextSource, Inc.'s Motion for Summary Judgment or, in the alternative, Motion for Summary Adjudication of Issues. According to the declaration filed by counsel for nextSource, Inc., Juan C. Araneda, in support of this Motion, Exhibits B through E and Exhibits G and I should be sealed for the foregoing reasons:

DOCUMENT	BASIS FOR SEALING
Exhibit B: Exhibits 91 (CITISTAFF-0000006– CITISTAFF-0000007) and 178 (NS000025) to the Deposition of Kevin McGinn	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.
Exhibit C: Exhibits 124 (TESLA-0000635-TESLA-0000636), 125 (TESLA-0000634), 127 (TELSA-0000646-TESLA-0000647), 130 (TESLA-0000004-TESLA-0000008), 132 (TESLA-0000730-TESLA-0000737), 134 (TESLA-0000317), 136 ((TESLA-0000320), 140 (CITISTAFF-0000009-CITISTAFF-0000010), and 142 (TESLA-0000752-TESLA-0000753) to the Deposition of Wayne Jackson	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.
Exhibit D: Exhibits 1 (CITISTAFF-0000034-CITISTAFF-0000035), 3 (CITISTAFF-0000039), 14 (TESLA-0000005-TESLA-0000008), and 15 (CITISTAFF-0000050-CITISTAFF-0000055) to the Deposition of Owen Diaz, Vol. I	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.
Exhibit E: Exhibit 33 (CITISTAFF-0000043-CITISTAFF-0000045) to the Deposition of Owen Diaz, Vol. II	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.
Exhibit G: Exhibit 88 (CITISTAFF-0000001-CITISTAFF-0000003) to the Deposition of Monica DeLeon	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.
Exhibit I: Exhibits 43 (TESLA-0000511), 53 (TESLA-0000308), 55 (TESLA-0000641), 56 (TESLA-0000135-TESLA-0000136), and 64 (CITISTAFF-0000011–CITISTAFF-0000013) to the Deposition of Edward Romero	Marked confidential pursuant to Protective Order (Dkt. No. 50.) Filing this document would violate the Protective Order.

[PROPOSED] ORDER GRANTING DEFENDANT NEXTSOURCE, INC.'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF SUMMARY JUDGMENT

1           Appearing the requested relief is warranted, this Court orders:

2           1.       Defendant nextSource, Inc.'s Administrative Motion to File Documents Under  
3 Seal in Support of nextSource, Inc.'s Motion for Summary Judgment or, in the alternative,  
4 Motion for Summary Adjudication of Issues is **GRANTED**.

5           2.       The physical copies in the Court's files of Exhibits B through E and Exhibits G  
6 and I to the Declaration of Juan C. Araneda in Support of Defendant nextSource, Inc.'s Motion  
7 for Summary Judgment or, in the alternative, Motion for Summary Adjudication of Issues shall  
8 be **SEALED** and remain sealed until further order of the Court.

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11           Dated: \_\_\_\_\_, 2019

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12           JUDGE WILLIAM H. ORRICK  
13           UNITED STATES DISTRICT JUDGE

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